

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CIVIL NO. 3:24-CV-01002-MOC-SCR

SALLAMONDRA ROBINSON,)
INDIVIDUALLY AND AS)
PERSONAL REPRESENTATIVE)
OF THE ESTATE OF)
SHANQUELLA ROBINSON,)
DECEASED,)
)
Plaintiff,)
)
)
)
)
v.)
)
DAEJHANAE JACKSON,)
ALYSSE HYATT, MALIK DYER,)
WENTER DONOVAN,)
KHALIL COOKE,)
NAZEER TYREE WIGGINS,)
UNITED STATES DEPARTMENT)
OF STATE, AND THE)
FEDERAL BUREAU OF)
INVESTIGATION,)
)
Defendants.)

FEDERAL DEFENDANTS' MOTION TO DISMISS

COMES NOW the United States of America, on behalf of the Federal Bureau of Investigation (“FBI”) and United States Department of State (“State Department”), hereinafter “Federal Defendants,” by and through Dena J. King, United States Attorney for the Western District of North Carolina, and moves to dismiss the Verified Amended Complaint (“Amended Complaint”) (Doc. 6) filed in this civil action for lack of subject-matter jurisdiction pursuant to Fed.R.Civ.P. 12 (b) (1) and for failure to state a claim upon which relief may be granted, pursuant

to Fed.R.Civ.P. 12(b)(6). In support of this Motion the Federal Defendants provide a Memorandum of Law.

This 21st day of January, 2025.

Respectfully submitted,

DENA J. KING
UNITED STATES ATTORNEY

s/GILL P. BECK
ASSISTANT UNITED STATES ATTORNEY
CHIEF, CIVIL DIVISION
N.C. Bar No. 13175
Room 233, U. S. Courthouse
100 Otis Street
Asheville, North Carolina 28801-2611
Phone: 828-259-0645
Fax: 828-271-4327
Email: gill.beck@usdoj.gov